

SO. CAL. EQUAL ACCESS GROUP  
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Attorneys for Plaintiff  
DEONDRE RAGLIN

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DEONDRE RAGLIN,  
Plaintiff,  
vs.

SHALABI ENTERPRISES, LLC; and  
DOES 1 to 10,  
Defendants.

**Case No.: 5:22-cv-01298-FLA-JPR**

**Plaintiff's Notice of Motion and Motion  
for Default Judgment by Court**

Date: January 20, 2023  
Time: 1:30 p.m.  
Courtroom: 6B

Honorable Judge Fernando L. Aenlle-  
Rocha

To Defendant SHALABI ENTERPRISES, LLC and the attorneys of record, if any:  
Please take notice that on January 20, 2023, at 1:30 p.m., or as soon thereafter as this  
matter may be heard by this Court located at 350 West First Street, Los Angeles,  
California, Plaintiff DEONDRE RAGLIN will present Plaintiff's motion for default  
judgment against Defendant SHALABI ENTERPRISES, LLC. The Clerk has previously  
entered the default on said Defendant on November 23, 2022.

At the time and place of hearing, Plaintiff will present proof of the following  
matters: (1) Defendant SHALABI ENTERPRISES, LLC is not a minor or incompetent  
person or in military service or otherwise exempted under the Soldier and Sailor's Civil

1 Relief Act of 1940; (2) Defendant SHALABI ENTERPRISES, LLC has not appeared in  
2 this action; and (3) Plaintiff is entitled to judgment against said Defendant on account of  
3 the claims pleaded in the complaint, to wit: a violation of the Americans with Disabilities  
4 Act.

5 The Plaintiff seeks a judgment in the amount of \$2,627.00 in attorney fees and  
6 costs as set forth in the attached declaration of Jason J. Kim and an Order directing the  
7 Defendant to: make alterations in such a manner that, to the maximum extent feasible, the  
8 goods, services, facilities, privileges, advantages, or accommodations offered by  
9 Defendant is readily accessible to and usable by individuals with disabilities at the  
10 property located at or about 1800 N. Long Beach Blvd., Compton, California. This  
11 motion is based on this notice, the declarations submitted in support of this motion, and  
12 other matters which may be presented at the hearing.

13 Notice of the original motion for default judgment by court was served on  
14 Defendant SHALABI ENTERPRISES, LLC on December 23, 2022 by first class United  
15 States Mail, postage prepaid.

16  
17 Dated: December 23, 2022

**SO. CAL. EQUAL ACCESS GROUP**

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20 By: /s/ Jason J. Kim  
21 Jason J. Kim, Esq.  
22 Attorneys for Plaintiff  
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